

BRITISH CURLING PRIVACY NOTICE

What this privacy notice covers

British Curling is committed to protecting your personal information. In this notice, references to 'we' or 'us' means British Curling. This notice explains how we collect and use the personal information about you.

Who we are

British Curling is a private company limited by guarantee without share capital and its registered company number is SC304110.

British Curling is the national governing body for the sport of curling in the United Kingdom. British Curling is responsible for performance programmes leading to Olympic and Paralympic Games. British Curling's members are: English Curling Association, Welsh Curling Association, Royal Caledonian Curling Club and Scottish Wheelchair Curling Association.

British Curling operates the website www.britishcurling.com.

British Curling will be a "controller" of the personal information that you provide to us through the Website, unless otherwise stated.

Information we gather

British Curling gathers certain information about you.

We collect information in the following ways:

- **Information you give us**

You may give us information when using our Website or writing to us. Information may include your name, age, gender, postal address, email address, phone number.

- **Information we get from your use of our Website and services**

Each time you visit our Website, we may automatically collect certain information. This information includes technical information, such as Internet Protocol (IP) addresses used to connect your computer to the internet, your login information, browser type and version, browser plug-in types and versions, operating system and platform and information relating to what pages you have viewed;

When you participate in our programmes or events, the following information may be collected and shared with our appointed staff/contractors and event organisers: your name, gender, playing position, date of birth / age category, email, address, phone number, club, disability information. Competition results may also be published.

Photography and video may be taken at British Curling's programmes and events, and these images may be used on our website, social media platforms and promotional or internal documents.

- **Information about you from third parties**

We work closely with third parties (including, for example, British Olympic Association, British Paralympic Association, World Curling Federation, event/business partners, associate bodies, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers,) and may receive information about you from them.

How we may use your information

We rely on the legitimate interest basis to use your personal information in some circumstances. For example, when you apply to participate in a British Curling programme, we have a legitimate organisational interest to use your information to respond to you and give you the benefits of being a participant as explained on the Website regarding features of being involved.

We also rely on obtaining your consent to use your personal information. For example, we will seek your consent to receive information via email and post about British Curling.

We may use your information for a number of purposes including the following:

- Compliance with legal, regulatory and corporate governance obligations and good practice
- To provide you with information about our work or our activities that you have agreed to receive;
- Building profiles

We may use profiling and screening techniques to ensure communications are relevant and timely, and to provide an improved experience for our members and individuals who we may have a formal relationship with such as athletes and coaches. Profiling allows us to evaluate and therefore understand our participants and individuals who we may have a formal relationship with such as umpires using appropriate statistical analysis. We do this because it helps us to make appropriate communications to our members and those individuals who we have a formal relationship with.

We do not carry out profiling in relation to children.

When building a profile, we may analyse geographic, demographic and other information relating to you in order to better understand your interests and preferences in order to contact you with the most relevant communications. We may use additional information from third party sources when it is available. Such information is compiled using publicly available data about you, for example addresses or listed competition results.

We do this to:

- Ensure we know how you prefer to be contacted
- Keep a record of your relationship with us.

We will use the information we get from your use of our Website and services to:

- administer our Website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- improve our Website to ensure that content is presented in the most effective manner for you and for your computer;
- allow you to participate in interactive features of our service, when you choose to do so;
- as part of our efforts to keep our Website safe and secure;
- measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- make suggestions and recommendations to you and other users of our Website about goods or services that may interest you or them; and
- any other reasonable purposes of British Curling, acting always in accordance with the data protection law (including GDPR and as amended from time to time).

We will use the information you give us to:

- perform services you have requested (such as providing you with programme services or providing you with information you have asked for);
- administer the sport of curling, for instance by organising competitions;
- provide you with information about other goods and services that we offer that are similar to those that you have already purchased or enquired about;

- where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this.
- notify you about changes to our service, including but not limited to any changes to programmes;
- ensure that content from our Website is presented in the most effective manner for you and for your computer; and
- any other reasonable purposes of British Curling, acting always in accordance with the data protection law (as amended from time to time).

Information Sharing and Disclosure

We may share your information with the following selected third parties:

- Associate bodies such as Curling Clubs, Nation Governing Bodies of Curling in order that they may communicate with you regarding curling events only or to allow the associate bodies to manage the running of the sport in their areas.
- Analytics and search engine providers that assist us in the improvement and optimisation of our Website.

We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- If British Curling or substantially all of its assets are acquired by a third party, in which case personal data held by it about individuals who have applied for selection (whether successfully or unsuccessfully) will be one of the transferred assets;
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply other agreements; or
- To protect the rights, property, or safety of British Curling, our Members, participants or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

We require these third parties to comply strictly with our instructions and data protection laws and we will make sure that appropriate controls are in place. We enter into contracts with all of our data processors and regularly monitor their activities to ensure they are complying with British Curling's policies and procedures.

We may disclose your personal information to third parties if we are under a duty to disclose your personal data in order to comply with any legal obligation (for example to government bodies and law enforcement agencies).

Users under 18

If you are under 18 and would like to get involved, please ensure that you have consent from a parent or guardian before giving us your personal information. When we collect data about a child or young person aged under 18 we will make it very clear as to the reasons for collecting this data and how it will be used.

Keeping your records

We keep records only for as long as required to operate the service in accordance with legal requirements and tax and accounting rules.

We may retain non-identifiable data for statistical purposes for longer than 5 years.

We will keep certain personal information of participants for longer in order to confirm your identity, when you were involved with British Curling and for how long. We need to do this to comply with the Companies Act 2006, which requires us to keep a register of members or in the event of a claim against British Curling.

Where we may store your information

The data that we collect from you will be transferred to and stored at British Curling's registered office and online systems.

By submitting your personal data, you agree to this transfer, storing or processing. British Curling will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Notice.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Your rights

You can exercise any of the following rights by writing to us at info@britishcurling.com.

You have the right to:

- Have any inaccuracies in your data corrected.
- Request that we delete your personal data.
- Object to profiling. Profiling is any automated processing of personal data to evaluate any feature of your behaviour preference or location, including online tracking and behavioural advertising.
- Request that we do not process your personal data for marketing purposes.
- You have a right to request a copy of the personal information we hold about you. This is called a Data Subject Access Request (DSAR). We require you to prove your identity with two pieces of approved identification. We will respond within one month, of receipt of your written request and confirmed ID. Please provide as much information as possible about the nature of your contact with us to help us locate your records. This request is free of charge unless the request is manifestly unfounded or excessive.

Any requests received by British Curling will be considered under applicable data protection legislation. If you remain dissatisfied, you have the right to raise a complaint with the Information Commissioner's Office at www.ico.org.uk

Changes to this notice and the way we treat personal information

We may update the terms of this privacy notice at any time, so please check it from time to time. We will notify you about significant changes in the way we treat personal information by sending a notice to the primary email address you have provided to us or by placing a prominent notice on our Website. By continuing to use our Website you will be deemed to have accepted such changes.

How to contact us

If you want to request information about our privacy policy or have any questions or concerns about your personal data, you can email or write to us at:

Email: info@britishcurling.com

Data Protection Officer
British Curling, Ochil House, Springkerse Business Park, Stirling FK7 7XE

Updated: 23/05/2018